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June 10, 2004

Mr. Joseph Cosentino United States Environmental Protection Agency 2890 Woodbridge Avenue, Bldg. 209, Mail Stop 211 Edison, New Jersey 08837 VIA FAX AND U.S. MAIL

RE: Bayonne Barrel & Drum Site, Newark, NJ Progress Report No. 4

Dear Mr. Cosentino:

On behalf of the Bayonne Barrel & Participating Parties and pursuant to Paragraph 23 of the Administrative Order on Consent, enclosed please find three (3) copies of Progress Report No. 4 covering the period from May 1, 2004 through May 31, 2004.

Very truly yours,

de maximis, inc.

William J. Lee

cc: S. Flanagan, USEPA

S. Kehayes, NJDEP

J. Jones, City of Newark

J. Allaire, Kirkpatrick & Lockhart

W. Hyatt, Kirkpatrick & Lockhart

D. Reid-Green, BASF

J. Vidumsky, DuPont

427161

BAYONNE BARREL & DRUM SUPERFUND SITE PROGRESS REPORT NO. 4 May 1, 2004 through May 31, 2004

Description of the Actions Taken Toward Achieving Compliance with the Administrative Order on Consent Since the Previous Report:

- Weekly construction progress meetings were held each week during May to review schedules, discuss technical details and promote a coordinated effort to complete the work required.
- A signed final version of the Work Plan components including the Construction Operations Plan, T&D Plan, and Health and Safety Plan were transmitted to USEPA.
- Removal of all the illegally dumped MSW and C&D waste is complete.
- Asbestos removal is complete and all materials have been transported for disposal.
- A plan was prepared to remove the non-hazardous sludge in AST-6 and its associated trenches and vessel all what appear to have been part of the plants' wastewater treatment system. The work was initiated early in the month but was complicated by an analysis of the sludge in the subsurface waste collection box which indicated hazardous for lead. These materials were loaded into "vactainers" and staged for off-site disposal. The metal vessels have been decontaminated and scrapped.
- The demolition contractor completed all building demolition, removal for recycle or disposal all associated materials and demobilized.
- To date a total of 10443.5 man hours have been worked at the site without a lost time accident.
- Decon waters and other collected waters from various activities have been collected, analyzed and transported for off-site disposal as non-hazardous.
- The platforms/loading docks attached to Buildings 4 and 5 will be leveled. The sands
 used for backfill will be tested for reuse on-site. If not acceptable for re-use, these
 sands will be evenly spread and covered with stone.
- Flourescent bulbs and mercury switches were removed from the site for recycling/disposal.
- Work is ongoing to complete removal of the "septic" tanks and their contents identified
 in the scope of work.



Mr. Joseph Cosentino Bayonne Barrel & Drum Superfund Site Progress Report No. 4 June 10, 2004

• Final fence repairs are scheduled for June as well as installation of placards every 100 feet along the fence identifying the site as hazardous.

Summary of all Results of Sampling, Tests or Other Data Received or Generated Since the Previous Report:

Sample results of the various wastes and waste profiles have been transmitted under separate cover.

Completed Deliverables Since the Previous Report:

None.

Actions Planned Prior to Submittal of Next Two Reports:

- Complete waste characterization sampling and obtain disposal facility approvals.
- Complete removal of below ground septic/storage tanks and their contents, and associated piping.
- Submit Progress Report No. 5 July 2004 and No. 6 August 2004.

Percentage Completion:

Work Plan Submittal and Approval- 100% Construction Operations Plan Implementation - 90% Post-Removal Site Control Plan - 0% Final Report - 0%

Delays Encountered or Anticipated:

PCBs encountered in the Septic Tank near Building #1 will require a Work Plan addendum.

